

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF MISSISSIPPI  
DELTA DIVISION

UNITED STATES OF AMERICA

VS.

CAUSE NO. 3:21CR107

THOMAS IROKO AYODELE aka "ROKO"

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MOTION FOR BOND PENDING SENTENCING

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COMES NOW, the Defendant, **Thomas Iroko Ayodele a/k/a "Roko"**, by and through the undersigned counsel, William F. Travis, and files this Motion for Bond Pending Sentencing, would state unto the Court as follows:

1. Ayodele intends to show by clear and convincing evidence that (1) he is not likely to flee; and/or (2) he poses no danger to the safety of any other person in the community. *See* 18 U.S.C. § 3143(a).

WHEREFORE, PREMISES CONSIDERED, the defendant, Thomas Iroko Ayodele a/k/a "Roko", respectfully requests that he be released on bond pending sentencing.

**RESPECTUFLY SUBMITTED**, this the 27<sup>th</sup> day of February, 2023.

THOMAS IROKO AYODELE, Defendant

BY: /s/ William F. Travis

William F. Travis, MSB 8267  
8619 Highway 51 N.  
Southaven, MS 38671  
(662)393-9295  
(662)393-9414 fax  
[bill@southavenlaw.com](mailto:bill@southavenlaw.com)

**CERTIFICATE OF SERVICE**

I, the undersigned attorney, do hereby certify that a true and correct copy of the foregoing Joinder to the *Motion for Bond Pending Sentencing* has this day been electronically mailed to:

Honorable Robert Mims  
[robert.mims@usdoj.gov](mailto:robert.mims@usdoj.gov)

**THIS**, the 27<sup>th</sup> day of February, 2023.

/s/ William F. Travis  
William F. Travis, Certifying Attorney